

# MEMO ENDORSED



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 1, 2021

**By ECF**

Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

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**Re: *United States v. Bencosme*, 21 Cr. 71 (ALC)**

Dear Judge Carter:

The parties write jointly to submit a status report in this case per the Court's oral order of February 9, 2021.

The defendant plans to submit a deferred prosecution application to the Government by the end of this week. The parties propose that they submit an additional joint status report to the Court in 30 days, by which time the Government hopes to have reached a decision on the deferred prosecution application.

The Government further requests that the Court exclude time under the Speedy Trial Act until the next status report so that the parties can continue to discuss a pretrial resolution and the defendant can review discovery. The defendant does not object to the exclusion of time.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney  
Southern District of New York

/s/ Kevin Mead  
Kevin Mead  
Assistant United States Attorney  
(212) 637-2211

cc: Marne Lenox, Esq., counsel for Angel Bencosme (by ECF)

The application is **GRANTED**. Joint status report due 7/2/21.  
Time excluded from 6/1/21 through 7/2/21 in the interest of justice.

So Ordered. *Andrew L. Carter*  
6/1/21